

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. -

KEITH RANIERE, CLARE BRONFMAN,  
and KATHY RUSSELL

Defendants.

Case No. 18 Cr. 00204-NGG

**DECLARATION OF  
PAUL DEROHANNESIAN II**

PAUL DEROHANNESIAN II, pursuant to U.S.C. § 1746, declares as follows:

Pursuant to 28 U.S.C. § 1746, I, Paul DerOhannesian II, hereby declare:

1. I am a principal in the law firm of DerOhannesian & DerOhannesian, attorneys for Defendant Keith Raniere, and as such am fully familiar with the facts and circumstances thereof. I make this affirmation in support of Defendant Raniere's Motions *In Limine*.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 19, 2019  
Albany, New York

/s/ Paul DerOhannesian II  
Paul DerOhannesian II